

Monica McQueen

June 29, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing to you to express my deep concern over the proposed Business Opportunity Rule R511993. I have been an Independent Consultant with Arbonne International for almost two years and have a growing team of over 70 people. I have seen this business and our products literally change people's lives (including mine) for the better. I've never been more impressed or more impacted by a company with such incredibly high ethical business practices and operating standards in my lifetime. I truly believe that Arbonne does everything in its power to change (for the better) and uphold the utter highest impression of network marketing and direct sales principles as we currently operate our businesses. Thus, I am gravely concerned that in its present form, this proposed ruling could prevent me from continuing as an Arbonne Independent Consultant, and could negatively impact potential businesses for hundreds of thousands of people nation-wide. I absolutely appreciate the FTC's responsibility to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and, most importantly, to sponsor people into the business to grow my own business.

One of the most concerning and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong the Arbonne opportunity. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business and would throw up a metaphoric 'red flag' to potential sponsorees, when there is no reason for such concern with our company.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. This seems extraordinarily unfair and extreme to disclose something like this to my potential sponsorees when you consider the negative impression it would effect (because it does not matter if the company was found innocent). When you consider, as well, the fact that you can purchase a vehicle (at exponentially larger monetary amounts) and not have lawsuits disclosed, this rule seems almost absurd. Having to disclose any lawsuit information may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. Having extensive business experience prior to my Arbonne

career, I am fully aware of how often *all* companies are exposed to frivolous and faulty lawsuits because of unethical people searching out companies making lucrative profits and who feel deserving of their share. I fear that if this rule were instated, I would be penalized and the integrity and ethical professionalism of my business would be in serious jeopardy by the impression a mention of a lawsuit would leave, even though I (and likely Arbonne) have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. Again, this seems extreme and hampering on the way my team builds their businesses. I am always more than happy to provide references (in fact, most all of the time, that is how I receive new customers, is through referrals), but identity theft is a huge concern for many of my clients and I am very uncomfortable with giving out personal information about individuals, especially without their permission or knowledge, to strangers – this is not something I would be willing to do and I know for a fact that my clients would have such issues with this (I have several clients who have already had their identity stolen) that they would decide not to buy from Arbonne, if that were the case.

Also, sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, “If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers” and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

Having extensive background experience in advertising, telecommunications, and communications industries, I truly appreciate the work of the FTC in protecting consumers, however I believe this proposed new rule would have extraordinary detrimental (and unintentional) consequences to my business and my family’s financial future. I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me.

Thank you for your time and understanding.

Sincerely,

Monica McQueen
Executive District Manager,
Independent Consultant,
Arbonne International